

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

BRIAN RATCLIFF,	)	CASE NO. 2:18-cv-00745
	)	
Plaintiff,	)	JUDGE ALGENON MARBLEY
	)	
v.	)	MAGISTRATE JUDGE KIMBERLY
	)	JOLSON
MOUNT CARMEL HEALTH SYSTEM,	)	
	)	
Defendant.	)	
	)	

**JOINT MOTION TO EXTEND REMAINING CASE DEADLINES**

Pursuant to Local Rule 7.3(a), Plaintiff Brian Ratcliff (“Plaintiff”) and Defendant Mount Carmel Health System (“Defendant”) jointly move this Court to extend the current discovery deadline and the dispositive motions deadline sixty (60) days beyond their current scheduled dates so that they may engage in settlement negotiations. The reasons supporting this Motion are set forth in more detail in the below Memorandum.

Respectfully submitted:

/s/ Rayl L. Stepter  
Rayl L. Stepter (0047505)  
5650 Blazer Parkway  
Dublin, Ohio 43017  
Telephone: (614) 468-4100  
Facsimile: (614) 468-4101  
[raylstepster@stepterlaw.com](mailto:raylstepster@stepterlaw.com)  
*Trial Attorney for Plaintiff*

/s/ Samuel E. Endicott (per authority)  
M. J. Asensio (0030777)  
Samuel E. Endicott (0094026)  
BAKER & HOSTETLER LLP  
200 Civic Center Drive, Suite 1200  
Columbus, Ohio 43215  
Telephone: (614) 228-1541  
[masensio@bakerlaw.com](mailto:masensio@bakerlaw.com)  
[sendicott@bakerlaw.com](mailto:sendicott@bakerlaw.com)  
*Trial Attorneys for  
Defendant*

**MEMORANDUM IN SUPPORT**

Good cause exists to grant the parties' requested extension of sixty (60) days. The parties have exchanged written discovery, including interrogatories and requests for production. The parties have decided to explore mediation of their dispute at this time rather than incur additional time and expense. Accordingly, the parties respectfully request that the Court enter an order extending the remaining deadlines in the original case schedule by sixty (60) days. This would result in a new discovery cut-off date of July 30, 2019 and a dispositive motion deadline of August 27, 2019. The parties will submit a proposed order pursuant to Local Rule 7.3(a).

Respectfully submitted:

/s/ Rayl L. Stepter  
Rayl L. Stepter (0047505)  
5650 Blazer Parkway  
Dublin, Ohio 43017  
Telephone: (614) 468-4100  
Facsimile: (614) 468-4101  
raylstepter@stepterlaw.com  
*Trial Attorney for Plaintiff*

/s/ Samuel E. Endicott (per authority)  
M. J. Asensio (0030777), Trial Attorney  
Samuel E. Endicott (0094026)  
BAKER & HOSTETLER LLP  
200 Civic Center Drive, Suite 1200  
Columbus, Ohio 43215  
Telephone: (614) 228-1541  
masensio@bakerlaw.com  
sendicott@bakerlaw.com  
*Trial Attorneys for  
Defendant*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was electronically filed on May 29, 2019. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/Rayl L. Stepter  
Rayl L. Stepter  
Trial Attorney for Plaintiff